

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ADVANCED LITHIUM
ELECTROCHEMISTRY (CAYMAN) Co.
Ltd., and ADVANCED LITHIUM
ELECTROCHEMISTRY CO., LTD.,

*Declaratory Judgment
Plaintiffs,*

v.

HYDRO-QUEBEC; CENTRE NATIONAL
DE LA RECHERCHE SCIENTIFIQUE;
UNIVERSITE DE MONTREAL; and
LIFEPO4+C LICENSING AG,

*Declaratory Judgment
Defendants.*

Case No. 1:24-cv-01421-RDA-WBP

**JOINT NOTICE REGARDING HEARING AND SUBMISSION WITHOUT ORAL
ARGUMENT**

Pursuant to Local Civil Rule 7(E), Plaintiffs Advanced Lithium Electrochemistry (Cayman) Co., Ltd. and Advanced Lithium Electrochemistry Co., Ltd. (collectively, “Plaintiffs”) and Defendants Hydro-Quebec, Centre National de la Recherche Scientifique, Universite de Montreal, and LiFePO4+C Licensing AG (collectively, “Defendants”) (together with Plaintiffs, the “Parties”) provide the Court with this Joint Notice regarding a hearing on Defendants’ Renewed Motion to Dismiss Plaintiffs’ Complaint with Prejudice for Failure to State a Claim (Dkt. No. 33) (the “Motion”).

PLEASE TAKE NOTICE that Defendants are amenable to the Court deciding Defendants’ Motion without oral argument. Plaintiffs request a hearing on the Motion. To the extent the Court desires to set a hearing on Defendants’ Motion, the Parties have conferred and are available for a

hearing on Wednesday, February 26, 2025 at 10:00 a.m., or as soon thereafter as the Parties may be heard.

February 6, 2025

/s/ Bradford C. Schultz

Bradford C. Schultz (VA Bar No. 91,057)
**FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP**
1875 Explorer Street, Suite 800
Reston, VA 20190
Phone: (571) 203-2700
Fax: (202) 408-4400

Ming-Tao Yang (pro hac vice)
ming.yang@finnegan.com
Jeffrey D. Smyth (pro hac vice)
jeffrey.smyth@finnegan.com
**FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP**
3300 Hillview Ave. Palo Alto, CA 94304
Telephone: (650) 849-6783
ATTORNEYS FOR PLAINTIFFS
Advanced Lithium Electrochemistry
(Cayman) Co. Ltd. and Advanced Lithium
Electrochemistry Co., Ltd.

Respectfully submitted,

/s/ April E. Weisbruch

April E. Weisbruch (Va. Bar No. 79191)
MCDERMOTT WILL & EMERY LLP
500 North Capitol Street, NW
Washington, DC 20001-1531
Tele: 202 756 8000
aweisbruch@mwe.com

Kevin Meek (pro hac vice)
Aashish Kapadia (pro hac vice)
Christian Tatum (pro hac vice)
MCDERMOTT WILL & EMERY LLP
300 Colorado Street, Suite 2200
Austin, TX 78701
Tele: 512 726 2600
kmeek@mwe.com
akapadia@mwe.com
ctatum@mwe.com
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2025, the foregoing was filed electronically and served on all counsel of record.

/s/ April E. Weisbruch
April E. Weisbruch